

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GEORGE YARID,

Plaintiff

v.

SHON BRENNAN, WILLIAM
MARKLAND, AND YOUTUBE, LLC,

Defendants

Civil Action No. 3:16-cv-00756-JAG

DEFENDANT YOUTUBE, LLC'S MOTION TO DISMISS

Defendant YouTube, LLC, by counsel, respectfully moves this Court to dismiss Plaintiff George Yarid's Second Particularized Complaint (Docket No. 15) pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim upon which relief can be granted. The grounds for this motion are more fully set forth in Defendant's YouTube, LLC's Memorandum in Support of Motion to Dismiss, which is filed herewith.

Dated: May 19, 2017

Respectfully submitted,

s/ Veronica S. Ascarrunz

Veronica Ascarrunz (VSB NO. 67913)
WILSON SONSINI GOODRICH & ROSATI, P.C.
1700 K Street, N.W., Fifth Floor
Washington, D.C. 20006
Telephone: (202) 973-8843
Facsimile: (202) 973-8899
vascarrunz@wsgr.com

David H. Kramer, admitted *pro hac vice*
WILSON SONSINI GOODRICH & ROSATI, P.C.
650 Page Mill Road
Palo Alto, CA 94304

Washington, D.C. 20006
Telephone: (610) 493-9300
Facsimile: (610) 493-6811
dkramer@wsgr.com

Peter C. Holm, admitted *pro hac vice*
WILSON SONSINI GOODRICH & ROSATI, P.C.
1 Market Street
Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Facsimile: (415) 947-2099
pholm@wsgr.com

Counsel for YouTube, LLC.

LOCAL RULE 7(k) STATEMENT

To Pro Se Plaintiff George Yarid:

Pursuant to Local Rule 7(k) and *Roseboro v. Garrison*, 528 F.2d 309 (4th Cir. 1975), you are hereby informed that Defendant YouTube, LLC has filed a dispositive motion addressed to your Second Particularized Complaint, ECF 15.

- (1) You are entitled to file a response opposing the motion and that any such response must be filed within twenty-one (21) days of the date on which the dispositive or partially dispositive motion is filed; and
- (2) The Court could dismiss the action on the basis of YouTube, LLC's papers if you do not file a response; and
- (3) You must identify all facts stated by YouTube, LLC with which you disagree and must set forth your version of the facts by offering affidavits (written statements signed before a notary public and under oath) or by filing sworn statements (bearing a certificate that it is signed under penalty of perjury); and
- (4) You are also entitled to file a legal brief in opposition to the one filed by YouTube, LLC.

CERTIFICATE OF SERVICE

I hereby certify that on May 19, 2017, I electronically filed with the Clerk of Court using the CM/ECF system, **DEFENDANT YOUTUBE, LLC'S MOTION TO DISMISS**. And I hereby certify that on May 19, 2017, I will mail the document by U.S. Mail to the following non-filing users:

George Yarid
Pro se Plaintiff
1307 Stoney Creek Drive
Henrico, Virginia 23238
(804) 836-2016
Gorgeousgeorgeshow1@netzero.com

Shon Brennan
5809 Los Amigos Street
Buena Park, CA 90620

William Markland
22382 Otesego Street
North Hollywood, CA 91601

Dated: May 19, 2017

/s/ Veronica S. Ascarrunz
Veronica S. Ascarrunz (VSB No. 67913)
WILSON SONSINI GOODRICH &
ROSATI, P.C. 1700 K Street, N.W.,
Fifth Floor Washington, D.C. 20006
Telephone: (202) 973-8843
Facsimile: (202) 973-8899
vascarrunz@wsgr.com
Counsel for YouTube, LLC.